

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

MICHAEL JOYNER,

Plaintiff,

v.

WESTINGHOUSE ELECTRIC COMPANY  
LLC,

Defendant.

Civil Action No. 3:25-cv-474-JDA-PJG

**DEFENDANT'S ANSWERS TO LOCAL CIVIL RULE 26.01  
INTERROGATORIES**

Defendant Westinghouse Electric Company LLC ("Westinghouse" or "Defendant"), by and through its undersigned counsel of record, hereby responds to the District of South Carolina's Local Civil Rule 26.01 Interrogatories as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER:** Defendant is not currently aware of any person or legal entity having a subrogation interest in any claim alleged in this action.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER:** Plaintiff has requested a jury trial on his claims, and jury trials are generally available for the claims alleged in the Complaint; however, to the extent Plaintiff seeks equitable relief, such claims should be tried and determined by the Court.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**ANSWER:** Defendant is not a publicly owned company. Defendant is not a parent, subsidiary, partner or affiliate of a publicly owned company, and does

**not own 10% or more of any publicly owned company. Defendant is owned by Brookfield Renewable Partners L.P., a publicly traded limited partnership, and Cameco, a publicly traded company.**

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER: Plaintiff's allegations arise from his employment with Defendant in Columbia, South Carolina. Therefore, this is the proper division for resolution of Plaintiff's claims.**

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER: Defendant is unaware of any other related matter filed in this District.**

- (F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER: Defendant is properly named.**

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER: Defendant denies that it is liable to Plaintiff on his claims and is not currently aware of any person or legal entity who is liable to either it or Plaintiff for the claims asserted in Plaintiff's Complaint.**

- (H) In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

**ANSWER: Not applicable, jurisdiction in based upon 28 U.S.C. § 1331.**

Respectfully submitted,

/s/ William H. Foster

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March 31, 2025